

In re Application of PARDIKAR et al.  
Serial No. 10/052,039

**REMARKS**

The Office action has been carefully considered. The Office action rejected claims 16-23, 25-27, 32-35, and 38 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,842,770 to Serlet et al. ("Serlet"). Further, the Office action rejected claims 1-11, 15, 36, and 37 under 35 U.S.C. § 103(a) as being unpatentable over Serlet in view of U.S. Patent No. 6,654,794 to French et al. ("French"). Further yet, the Office action rejected claims 12-14 and 28-30 under 35 U.S.C. § 103(a) as being unpatentable over Serlet in view of French and in further view of U.S. Patent No. 6,714,968 to Prust et al. ("Prust"). Still further, the Office action rejected claim 31 and 39-41 under 35 U.S.C. § 103(a) as being unpatentable over Serlet in view of Prust. The Office action rejected claim 24 under 35 U.S.C. § 103(a) as being unpatentable over Serlet in view of U.S. Patent No. 6,629,127 to Deen et al. ("Deen"). Applicants respectfully disagree.

By present amendment, claims 16 and 33 have been amended for clarification and not in view of the prior art. Applicants submit that the claims as filed were patentable over the prior art of record, and that the amendments herein are for purposes of clarifying the claims and/or for expediting allowance of the claims and not for reasons related to patentability. Reconsideration is respectfully requested.

Applicants thank the Examiner for the interview held (by telephone) on May 12, 2006. During the interview, the Examiner and applicants' attorney discussed the claims with respect to the prior art. The essence of applicants' position is incorporated in the remarks below.

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Prior to discussing reasons why applicants believe that the claims in this application are clearly allowable in view of the teachings of the cited and applied references, a brief description of the present invention is presented.

The present invention is directed to a system and method that automatically and transparently handles WebDAV file access, whereby applications (including WebDAV unaware applications) can access WebDAV files through conventional file system-directed API (application programming interface) calls or the like. Applications can also issue network-related requests to WebDAV servers, such as for browsing, with those requests transparently handled as if a WebDAV share was a local folder.

To this end, the present invention comprises a WebDAV redirector and related components (e.g., an I/O manager) that receive requests directed to a WebDAV server, and take actions to handle the request locally or remotely as appropriate. For example, the WebDAV redirector and related components support I/O requests and network requests directed to WebDAV servers identified by URI (Universal Resource Identifier) names, or by a drive, may be mapped to a WebDAV share.

The redirector components operate to determine whether an application's create or open I/O request is directed to a WebDAV server that is connected and operating, and if so, whether a specified share and file on that server are accessible by requesting capability information from the server. If so, the redirector informs a multiple UNC provider that it can handle the request, and a local copy of the file is downloaded and cached for local I/O access, whereby reads and writes

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to the WebDAV server are made from and to the cached file. When closed, the local file is uploaded to the WebDAV server (provided it has been modified on the client).

Network-related requests that are directed to a WebDAV server are also handled transparently, by acting on API calls or the like corresponding to the request. For example, an API call to enumerate a WebDAV share is provided to the WebDAV redirector components, which determine whether the server and share is valid, and if so, inform a multiple provider router that the request can be handled. Network communications are controlled by the WebDAV redirector components to handle the request.

Note that the above description is for example and informational purposes only, and should not be used to interpret the claims, which are discussed below.

**§102 Rejections**

Turning to the first independent claim rejected under §102, amended claim 16 generally recites a computer-implemented method, comprising receiving at a local application programming interface layer an application request that relates to a Uniform Resource Identifier, providing information corresponding to the request to a local WebDAV redirector via an I/O manager, and determining at the WebDAV redirector whether a server identified via the application request comprises a WebDAV-enabled server by obtaining capability information from the server, and if so, handling the request.

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The Office action rejected claim 16 as being anticipated by Serlet. More specifically, the Office action essentially contends that Serlet teaches receiving at a local API layer an application request that relates to a URI. Column 4, line 54 to column 5, line 2 and column 5, lines 20-52 of Serlet are referenced. Applicants note that a previous Office action acknowledged that Serlet fails to teach the remaining recitations of claim 16. However, the present Office action now contends that Serlet does teach these recitations. Thus, the Office action now contends that Serlet teaches providing information corresponding to the request to a local WebDAV redirector, and determining at the WebDAV redirector whether a server identified via the application request comprises a WebDAV-enabled server, and if so, handling the request. Column 11, lines 24-49 and column 5, lines 20-52 of Serlet are referenced. Applicants respectfully disagree.

Notwithstanding this reversal of position, applicants have amended claim 16 to recite providing information corresponding to the request to a local WebDAV-redirector via an I/O manager. The Office action specifically acknowledges (in the rejection of claim 1 discussed further below) that Serlet simply does not teach an I/O manager that is capable of handling I/O requests that may be directed to files that reside on a WebDAV-enabled server. Therefore, applicants submit that this amendment overcomes the §102 rejection put forth in the Office action for at least the foregoing reasons, and applicants submit that claim 16 is allowable over the prior art of record.

Applicants respectfully submit that dependent claims 17-23, 25-27, and 32, by similar analysis, are allowable. Each of these claims depends either directly or

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indirectly from claim 16 and consequently includes the recitations of independent claim 16. As discussed above, Serlet does not teach the recitations of claim 16, and therefore these claims are also allowable over the prior art of record. In addition to the recitations of claim 16 noted above, these dependent claims include additional patentable elements.

Turning to the next independent claim, amended claim 33 generally recites in a computer network, a system comprising, an application program that issues WebDAV-related requests, including at least one request having an identifier corresponding to a WebDAV server, a WebDAV redirector, the WebDAV redirector configured to communicate with a network server to obtain capability information thereof, and to evaluate the capability information to determine whether the network server comprises a WebDAV-enabled server, an I/O manager for that manipulates the WebDAV-related requests issued from the application program for providing to the WebDAV redirector, and when the capability information indicates that the network server is WebDAV-enabled, the WebDAV redirector locally handling each request corresponding to the WebDAV server that can be handled locally, and communicating with the WebDAV server to handle requests that cannot be handled locally.

The Office action rejected claim 33 as being anticipated by Serlet. More specifically, the Office action contends that Serlet teaches an application program that issues WebDAV-related requests, including at least one request having an identifier corresponding to a WebDAV server. Column 6, lines 25-64 of Serlet are referenced. Once again, a previous Office action acknowledged that Serlet fails to

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teach the remaining recitations of claim 16. However, the present Office action now contends that Serlet does teach these recitations. Thus, the Office action now contends that Serlet teaches a WebDAV redirector, the WebDAV redirector configured to communicate with a network server to obtain capability information thereof, and to evaluate the capability information to determine whether the network server comprises a WebDAV-enabled server, and when the capability information indicates that the network server is WebDAV-enabled, the WebDAV redirector locally handling each request corresponding to the WebDAV server that can be handled locally, and communicating with the WebDAV server to handle requests that cannot be handled locally. Column 11, lines 24-49 and column 7, lines 35-56 of Serlet are referenced. Applicants respectfully disagree.

Notwithstanding this reversal of position, applicants have amended claim 33 to recite an I/O manager for that manipulates the WebDAV-related requests issued from the application program for providing to the WebDAV redirector. The Office action specifically acknowledges (in the rejection of claim 1, discussed below) that Serlet simply does not teach an I/O manager that is capable of handling such I/O requests that may be directed to files that reside on a WebDAV-enabled server. Therefore, applicants submit that this amendment overcomes the §102 rejection put forth in the Office action for at least the foregoing reasons, whereby applicants submit that claim 16 is allowable over the prior art of record.

Applicants respectfully submit that dependent claims 34-35 and 38, by similar analysis, are allowable. Each of these claims depends either directly or indirectly from claim 33 and consequently includes the recitations of independent

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claim 33. As discussed above, Serlet does not teach the recitations of claim 33 and therefore these claims are also allowable over the prior art of record. In addition to the recitations of claim 33 noted above, each of these dependent claims includes additional patentable elements.

#### §103 Rejections

Turning to the §103 rejections, claim 1 generally recites in a computer network, a method comprising receiving at an I/O manager an I/O request initiated from an application program directed to a file on a WebDAV server, directing the I/O request to a WebDAV redirector for communicating with the WebDAV server to determine whether the request can be handled by obtaining capability information from the WebDAV server, and if so, requesting a file system to create the file, downloading the file to a local cache of the file system, and returning a file handle corresponding to the file in the local cache to the application program, providing access to the file in the local cache of the file system via the file handle, and receiving a request to close the file via the file handle, and when received, uploading the file from the local cache of the file system to the WebDAV server.

The Office action rejected claim 1 as being unpatentable over Serlet in view of French. More specifically, the Office action contends that Serlet teaches directing the I/O request to a WebDAV redirector for communicating with the WebDAV server to determine whether the request can be handled by obtaining capability information from the WebDAV server. Column 6, lines 25-64 of Serlet is referenced. Further, the Office action contends that Serlet teaches if so,

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requesting a file system to create the file. Column 7, lines 35-56 of Serlet is referenced. The Office action continues and contends that Serlet teaches downloading the file to a local cache of the file system. Column 9, lines 54-63 of Serlet is referenced. Further yet, the Office action contends that Serlet teaches returning a file handle corresponding to the file in the local cache to the application program. Column 11, lines 24-49 of Serlet is referenced. Finally, with respect to Serlet, the Office action contends that Serlet teaches receiving a request to close the file via the file handle, and when received, uploading the file from the local cache of the file system to the WebDAV server. Column 12, lines 45-54 is referenced.

The Office action concedes that Serlet fails to teach receiving at an I/O manager an I/O request initiated from an application program directed to a file on a WebDAV server. However, the Office action contends that French does disclose this concept. Specifically, the Office action contends that French teaches receiving at an I/O manager an I/O request initiated from an application program directed to a file on a WebDAV server. Column 4, line 58 to column 5, line 19 of French is referenced.

The Office action concludes that the recitations of claim 1 are obvious in view of the combination of the teachings of Serlet with the teachings of French because an improved network file system provides a client with the ability to access remote resources maintained by a server. Applicants respectfully disagree.

To establish *prima facie* obviousness of a claimed invention, all of the claim recitations must be taught or suggested by the prior art; (*In re Royka*, 490 F.2d

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981, 180 USPQ 580 (CCPA 1974)), and "all words in a claim must be considered in judging the patentability of that claim against the prior art;" (*In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)). Further, if prior art, in any material respect teaches away from the claimed invention, the art cannot be used to support an obviousness rejection. *In re Geisler*, 116 F.3d 1465, 1471, 43 USPQ2d 1362, 1366 (Fed Cir. 1997). Moreover, if a modification would render a reference unsatisfactory for its intended purpose, the suggested modification / combination is impermissible. See MPEP § 2143.01

Applicants submit that the Office action has failed to establish a *prima facie* case for obviousness. Serlet is directed, generally, to a system and method for allowing a local application to seamlessly access files as though the files were initially local and teaches virtually the same system and method as taught by other examples of prior art (such as taught by French). Serlet teaches an SFS network access program that may retrieve remote files from a remote WebDAV server, but cannot handle requests from anything other than the SFS network access program (i.e., general requests received via an I/O manager, because the request may have been initiated at some other program). Furthermore, the system of Serlet does not need to (nor can it) determine whether or not the WebDAV server is capable of handling specific file requests. In fact, the Office action explicitly acknowledges this by saying as much. The Office action turns to the teachings of French in a (failed) attempt to cure this deficiency.

French teaches, generally, a system and method for allowing a local application to remotely access a file through a file system manager that is operable

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to receive all requests for files from an operating system associated with the platform in which the file system manager is operating. However, the file system manager of French is pre-configured via the use of various FSDs for accessing remotely located files. One such FSD taught by French is a WebDAV FSD.

Thus, French requires a pre-configured relationship between the file system manager and the WebDAV FSD. Because the file system manager is already aware that the dedicated WebDAV FSD is functional as a result of the preconfigured relationship, there is no need to communicate with the WebDAV server to determine whether it can handle the request. Claim 1 recites, in contrast, communicating with the WebDAV server to determine whether the request can be handled. French teaches away from such a concept, instead relying on a pre-configured relationship between the file system manager and the WebDAV FSD. Thus, no such communication to determine file handling capabilities exists in French.

Furthermore, claim 1 recites that the WebDAV server returns capability information in response to the communication to determine whether the WebDAV server can handle the request. Certainly, French (or Serlet, for that matter) does not teach returning capability information as there is no need to do so. French is completely silent to the concept of verifying handling capability via capability information. (Applicants note that claims 16 and 33 also recite capability information, and hence any §103 rejections of these claims would also be improper for at least these reasons.)

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As such, Serlet and French, whether considered individually or in any permissible combination with each other or any other prior art of record, do not teach all the recitations of claim 1, (and if anything teach away from at least one recited limitation), and thus clearly fall short of the legal requirements to support an obviousness rejection. Applicants submit that claim 1 is allowable over the prior art of record for at least the foregoing reasons.

Applicants respectfully submit that dependent claims 2-15, by similar analysis, are allowable. Each of these claims depends either directly or indirectly from claim 1 and consequently includes the recitations of independent claim 1. As discussed above, Serlet and French, whether considered individually or in any permissible combination with each other or any other prior art of record (including Prust), fail to teach or suggest the recitations of claim 1 and therefore these claims are also allowable over the prior art of record. In addition to the recitations of claim 1 noted above, each of these dependent claims includes additional patentable elements.

For example, claim 4 recites the method of claim 1 wherein communicating with the WebDAV server to determine whether the request can be handled comprises issuing an HTTP OPTIONS request, and evaluating a response therefrom. The Office action contends that Serlet teaches this recitation. This is simply erroneous logic in that the Office action explicitly acknowledged that Serlet does not teach communicating with the WebDAV server to determine whether the request can be handled, but then contends that Serlet teaches a variation of how to accomplish this task, i.e., using an HTTP OPTIONS request. Although Serlet may

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be aware of an HTTP OPTIONS request, Serlet unquestionably does not teach using it in the manner recited in claim 4. For at least this additional reason, applicants submit that claim 4 is allowable over the prior art of record.

As another example, claim 5 recites the method of claim 1 wherein communicating with the WebDAV server to determine whether the request can be handled, comprises, issuing a WebDAV PROPFIND request directed to a share on the WebDAV server, and evaluating a response therefrom. Again, this is erroneous logic in that the Office action explicitly acknowledged that Serlet does not teach communicating with the WebDAV server to determine whether a request can be handled, but then contends that Serlet teaches a variation of how to accomplish this task, i.e., a WebDAV PROPFIND request. Although Serlet may be aware of a WebDAV PROPFIND request, Serlet does not teach using it in the manner recited in claim 5. For at least this additional reason, applicants submit that claim 5 is allowable over the prior art of record.

The Office action rejected claims 24 and 28-31 as being unpatentable over Serlet and French and other cited prior art. Applicants respectfully submit that dependent claims 24 and 28-31 are allowable by similar analysis to the analysis of claims 1 and 16. Each of these claims depends either directly or indirectly from claim 16 and consequently includes the recitations of independent claim 16. As discussed above, Serlet and French, whether considered individually or in any permissible combination with each other or any other prior art of record (including Prust), fail to teach or suggest the recitations of claim 16 and therefore these claims are also allowable over the prior art of record. In addition to the recitations

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of claim 16 noted above, each of these dependent claims includes additional patentable elements.

The Office action rejected claims 36-36 and 39-41 as being unpatentable over Serlet and French and other cited prior art. Applicants respectfully submit that dependent claims 36-36 and 39-41 are allowable by similar analysis to the analysis of claims 1 and 16. Each of these claims depends either directly or indirectly from claim 33 and consequently includes the recitations of independent claim 33. As discussed above, Serlet and French, whether considered individually or in any permissible combination with each other or any other prior art of record (including Prust and Dean), fail to teach or suggest the recitations of claim 33 and therefore these claims are also allowable over the prior art of record. In addition to the recitations of claim 33 noted above, each of these dependent claims includes additional patentable elements.

For at least these additional reasons, applicants submit that all the claims are patentable over the prior art of record. Reconsideration and withdrawal of the rejections in the Office action is respectfully requested and timely allowance of this application is earnestly solicited.

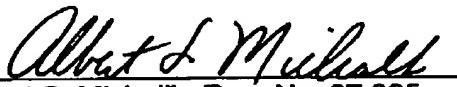
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### CONCLUSION

In view of the foregoing remarks, it is respectfully submitted that claims 1-41 are patentable over the prior art of record, and that the application is in good and proper form for allowance. A favorable action on the part of the Examiner is earnestly solicited.

If in the opinion of the Examiner a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney at (425) 836-3030.

Respectfully submitted,

  
Albert S. Michalik  
Albert S. Michalik, Reg. No. 37,395  
Attorney for Applicants  
Law Offices of Albert S. Michalik, PLLC  
704 - 228th Avenue NE, Suite 193  
Sammamish, WA 98074  
(425) 836-3030  
(425) 836-8957 (facsimile)